

EXHIBIT C

From: ncoppinger@bdlaw.com
To: toreilly@toxic torts.org
Cc: DKrainin@bdlaw.com; skauff@lojkd.com; WPetit@jgdpc.com; JGilmour@jgdpc.com; BJackson@jgdpc.com; dmiller@toxic torts.org; maxline@toxic torts.org; dboone@toxic torts.org; clopez@toxic torts.org; jdema@lojkd.com; nps short@lojkd.com; jarenas@lojkd.com; VCardenas@jgdpc.com; dblum@toxic torts.org; toxic torts@toxic torts.org
Subject: Re: Puerto Rico MTBE: Sunoco 30b6 Deposition
Date: Thursday, September 05, 2013 9:33:54 AM

Tracey,

Having not heard back from you, we have released these dates. We will propose new dates or be happy to discuss potential dates with you shortly.

-Nessa

From: Nessa Horewitch Coppinger
Sent: Tuesday, September 03, 2013 01:10 PM
To: 'toreilly@toxic torts.org' <toreilly@toxic torts.org>
Cc: Daniel M. Krainin; Scott Kauff <skauff@lojkd.com>; 'Will Petit' <WPetit@jgdpc.com>; 'John Gilmour' <JGilmour@jgdpc.com>; 'Bill Jackson' <BJackson@jgdpc.com>; 'Duane Miller' <dmiller@toxic torts.org>; 'Mike Axline' <maxline@toxic torts.org>; Daniel Boone <dboone@toxic torts.org>; Cynthia Lopez <clopez@toxic torts.org>; 'Jack Dema' <jdema@lojkd.com>; 'Nathan Short' <nps short@lojkd.com>; Justin J. Arenas <jarenas@lojkd.com>; 'Victor Cardenas' <VCardenas@jgdpc.com>; David Blum <dblum@toxic torts.org>; 'Miller, Axline & Sawyer' <toxic torts@toxic torts.org>
Subject: RE: Puerto Rico MTBE: Sunoco 30b6 Deposition

Tracey,

We have not heard back from you with respect to the dates offered more than three weeks ago for the 30(b)(6) notice issued to Sunoco, despite your email a week ago saying you would respond by COB the following day. As the deposition dates offered have been held for more than three weeks, and the dates are now two weeks away, if we do not hear from you confirming the dates by COB tomorrow, Wednesday, September 4th, we will release the offered dates of September 19th and 20th. In that case, we will discuss with you other possibilities for deposition dates.

-Nessa

Nessa Horewitch Coppinger

Principal

Beveridge & Diamond, P.C.

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Please consider the environment before printing this e-mail.

From: Tracey O'Reilly [mailto:toreilly@toxictorts.org]
Sent: Tuesday, August 27, 2013 3:06 PM
To: Nessa Horewitch Coppinger
Cc: Daniel M. Krainin; Scott Kauff; 'Will Petit'; 'John Gilmour'; 'Bill Jackson'; 'Duane Miller'; 'Mike Axline'; Daniel Boone; Cynthia Lopez; 'Jack Dema'; 'Nathan Short'; Justin J. Arenas; 'Victor Cardenas'; David Blum; 'Miller, Axline & Sawyer'
Subject: RE: Puerto Rico MTBE: Sunoco 30b6 Deposition

Ms. Horewitch Coppinger:

Please hold those dates and we will provide you with a response by close of business tomorrow.

Sincerely,

Tracey L. O'Reilly
Miller, Axline & Sawyer
1050 Fulton Avenue, Suite 100
Sacramento, California 95825
Tel: 916-488-6688
Fax: 916-488-4288
Email: toreilly@toxictorts.org

From: Nessa Horewitch Coppinger [mailto:NCoppinger@bdlaw.com]
Sent: Tuesday, August 27, 2013 1:57 PM
To: toreilly@toxictorts.org
Cc: Daniel M. Krainin
Subject: Puerto Rico MTBE: Sunoco 30b6 Deposition

Tracey,

In my letter to you dated August 9, 2013, Sunoco offered dates of September 19th and 20th for the 30(b)(6) deposition of Sunoco noticed by Plaintiffs in the Puerto Rico matter. The location for the deposition offered was Philadelphia. Can you confirm whether Plaintiffs would like to proceed with the deposition on those dates?

Thanks,
Nessa

Nessa Horewitch Coppinger
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